TSD File Inventory Index

Date: 49nt. 25, 2000

Initial: <u>(1779)</u>

Facility Name: /ɔ, // / ///			
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A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence	1	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments		C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests	4	.2 Import/Export Notifications	
.6 Annual and Biennial Reports	and the second s	C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		1 RFA Correspondence	
.2 Reports	CO.	.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	The state of the s
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence	A COLUMN TO THE PARTY OF THE PA	.2 RFI Workplan	mim 020P-
.2 Reports	A COLUMN PERSON	.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

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.5 RFI QAPP	.6 CMI QAPP	, , , , , , , , , , , , , , , , , , ,
.6 RFI QAPP Correspondence	.7 Lab Data, Soil-Sampling/Groundwater	Service and the service and th
.7 Lab Data, Soil-Sampling/Groundwater	.8 Progress Reports	
.8 RFI Progress Reports	D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence	.1 Administrative Record 3008(h) Order	Permission
.10 Interim Measures Workplan and Reports	.2 Other Non-AR Documents	B
D.3 Corrective Action/Remediation Study	E. Boilers and Industrial Furnaces (BIF)	Lyepunnun
.1 CMS Correspondence	.1 Correspondence	6 <u>254</u>
.2 Interim Measures	.2 Reports	C
.3 CMS Workplan	F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	A Charles
.4 CMS Draft/Final Report	G.1 Risk Assessment	-
.5 Stabilization	.1 Human/Ecological Assessment	Ŧ o
.6 CMS Progress Reports	.2 Compliance and Enforcement	
.7 Lab Data, Soil-Sampling/Groundwater	.3 Enforcement Confidential	Facility of
D.4 Corrective Action Remediation Implementation	.4 Ecological - Administrative Record	***************************************
.1 CMI Correspondence	.5 Permitting	2 ₀₂₇ -p-0
.2 CMI Workplan	.6 Corrective Action/Remediation Study	***************************************
.3 CMI Program Reports and Oversight	.7 Corrective Action Remediation Implementation	Section 1
.4 CMI Draft/Final Reports	.8 Endangered Species Act	*
.5 CMI QAPP	.9 Environmental Justice	O

Note: Transmittal Letter to Be Included with Reports.

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- 11 J					10 pp - 10 pp

A.2 Part A/ Interim Status



P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329



George V. Voinovich Governor

Donald R. Schregardus

Director

July 1, 1993

Molded Fiber-Glass Company Attn: Jay Finegan P.O. Box 675 Ashtabula, OH 44004

RE: EPA ID#: OHD049375215

LOCATION of INSTALLATION: 4401 Benetit Ave

Ashtabula, OH 44004

In response to your request of March 1993 the following information has been updated:

Status: small quantity generator

Contact: Jay Finegan

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau, Manager

Data Management Section

Division of Hazardous Waste Management

Thomas E. Crepeau

TEC/bab

cc: U.S. EPA, Region V

Ohio EPA District Office



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UNITED STATES ENVIRONMENTAL PROTÉCTION AGENCY

REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: RCRA ACTIVITIES

Jack Sanford, Safety Director Molded Fiber Glass Company 4401 Benefit Avenue P.O. Box 675

Ashtabula, Ohio 44004

RE: Interim Status Acknowledgement

FACILITY NAME: MOLDED FIBER GLASS CO

USEPA ID No. OHD 049 375 215

Dear Mr. Sanford:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

(M) 20'

Enclosure

cc: Ken Sippola, Robert Morrison

OHD049375215

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	4401 Benefit Ave.						
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UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

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- Endorse article "Return Receipt Requested" edjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT DF POSTAGE \$300



RETURN TO

> USEPA - Region V - RCRA Activities (Name of Sender)

P.O. Box A3587

(Street or P.O. Box)

Chicago, IL 60690-3587

(City, State, and ZIP Code)



UNITED STATES ENVIRU JENTAL PROTECTION AGENCY REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 6 1981

Molded Fiber Glass Company Jack Sanford 4401 Benefit Ave. Ashtadula, Ohio 44004

RE: Hazardous Waste Permit Application-Incomplete Part A (OHDO49375215) Facility Name (and EPA ID number) Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it—to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (*) on the application form, and return the form in time to reach this office by <u>December 7, 1981</u>. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by <u>January 7, 1982</u>.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Paul Lewandowski the reviewer of your application, at (312) 886-6164 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi
Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.

PS Form 381	SENDER: Complete items 1, 2, 3, and 4 Add your address in the SURN TO space on reverse.
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UNITED STATES POSTAL SERVICE

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SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

Complete items 1, 2, 3, and 4 on the reverse,

Attach to front of article if space permits, otherwise affix to back of article.

Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, 8300



RETURN TO

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(City, State, and ZIP Code)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-TUB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jack Sanford Molded Fiber Glass Company 4401 Benefit Ave. P.O. Box 675 Ashtabula, Ohio 44004

RE: Molded Fiber Glass Co. OHD049375215

Dear Mr. Sanford:

The referenced company is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Federal regulations (40 CFR Part 265 Subpart H) require that such facilities shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and proof of liability coverage by July 15, 1982 (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of the requirements of 40 CFR Part 265 Subpart H. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Failure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation. Please forward the financial responsibility proofs to:

RCRA Activities ATTN: Financial requirements P.O. Box A3587 Chicago, Il 60690

Mr. Thomas B. Golz, at (312) 886-4023, can provide additional information concerning this notice.

Sincerely,

William H. Miner, Chief

Technical, Permits, and Compliance Section

cc: Tegtmeyer - OEPA

MOLDED FIBER GLASS CO

OHD 049 375 215

FACILITY OPERATOR

MOLDED FIBER GLASS CO

FACILITY OWNER

ROBERT S MORRISON

FACILITY LOCATION

4401 BENEFIT AVE ASHTABULA

OH 44004

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

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VIRONMENTAL PROTECTION AGENCY

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IX. DESCRIPTION OF HAZARDOUS WASTES

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EPA Form 8700-13 [6-80] 5 1980

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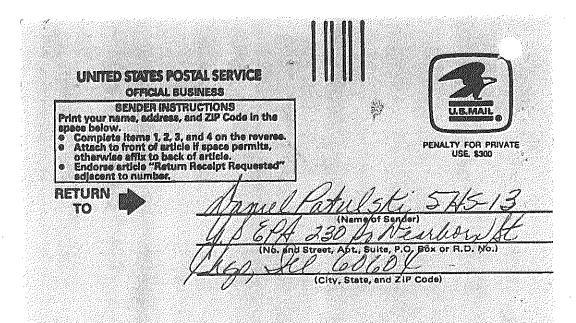
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PS Form 3800, June 1985

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PS Form 3800, June 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence A. Narducci Materials Manager Molded Fiber Glass Company 4401 Benefit Avenue Post Office Box 675 Ashtabula, Ohio 44004

> RE: Withdrawal of Part A Application Molded Fiber Glass Company OHD 049375215

Dear Mr. Narducci:

We have completed our review of your Part A Hazardous Waste Permit Application and your letter of May 6, 1988, requesting the withdrawal of your permit application. According to the information which you have submitted, your request for a change in status to that of a "generator accumulating waste on-site in compliance with 40 CFR §262.34" has been approved. For purposes of the Resource Conservation and Recovery Act, you are now considered a "generator of hazardous waste". As a generator, you are subject to the regulations contained in 40 CFR Part 262, and any other applicable regulations referenced therein. Your facility is no longer considered a treatment, storage, or disposal (TSD) facility.

You will retain your United States Environmental Protection Agency identification number as a generator of a hazardous waste, as set forth in 40 CFR §262.12.

Should you decide to initiate storage of hazardous waste generated on-site for longer than 90 days, you must comply with the applicable permit requirements set forth in 40 CFR Part 270.

Please contact Mr. Daniel Patulski of my staff, at (312) 886-0656, if you have any questions on this matter.

Sincerely,

ORIGINAL SIGNED BY/
KARL E. BREMER
Karl E. Bremer, Chief
RCRA Permitting Branch

cc: Edwin Lim, OEPA Dave Wertz, OEPA

5HS/Patulski:vw 5/24/88 Disk #1

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MOLDED FIBER GLASS COMPANY

P.O. BOX 675 ASHTABULA, OHIO 44004 PHONE: (216) 997-5851 FAX: (216) 992-0542 TELEX: 985465MFGAST

May 6, 1988

Mr. Daniel Patulski United States Environmental Protection Agency Region 5 230 South Dearborn Street Chicago, Illinois 60604

Dear Daniel,

This letter will confirm our phone conversation of May 6, 1988. The Molded Fiber Glass Company does not store any hazardous waste for longer than 90 days. Nor have we ever stored for longer than 90 days. We send our wastes to Chemical Solvents for recycling. They currently are picking up our wastes on a weekly basis to be recycled.

Also, I am sending you a copy of the certified letter I sent to RCRA Activities February 18, 1986. Your immediate response to this request will be greatly appreciated. Should you need more information from me please call 216-997-5851.

Sincerely yours,

MOLDED FIBER GLASS COMPANY

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Lawrence A. Narducci Materials Manager

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UNITED STATES POSTAL SERVICE OFFICIAL BUSINESS SENDER INSTRUCTIONS 25 APR Print your name, address, and ZIP 1988 Code in the space below. Complete items 1, 2, 3, and 4 on U.S.MAIL the reverse. Attach to front of article if space permits, otherwise affix to back PENALTY FOR PRIVATE of article. Endorse article "Return Receipt USE, \$300 Requested" adjacent to number. RETURN

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UNITED STATES POSTAL SERVICE

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SENDER INSTRUCTIONS

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PS Form 3800, June 1985

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

22 APR 1988

REPLY TO THE ATTENTION OF:

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Sanford Safety Director Molded Fiber Glass Company 4401 Benefit Avenue Ashtabula, Ohio 44004 withdraugh

RE: Part B Call-in

Molded Fiber Glass Company

OHD 049 375 215

Dear Mr. Sanford:

Some time ago, you should have received an acknowledgement of the United States Environmental Protection Agency's (U.S. EPA) receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, your facility is currently authorized with interim status under Section 3005(e) of RCRA. This letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR §270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility. The Part B application is due six months from the date you receive this letter.

Enclosed is a copy of 40 CFR Part 270 which lists the items required for submitting the Part B permit application for your facility. A copy of the "Part B Completeness Checklist" is enclosed to help you in preparing a comprehensive and complete permit application.

If your facility chooses not to pursue a full RCRA permit, you may withdraw your intent to seek a permit by filing a closure plan with the U.S. EPA and Ohio Environmental Protection Agency (OEPA). Federal RCRA closure regulations (40 CFR Subpart G) require that you submit a closure plan to: George Hamper (5HS-13), Chief, Ohio Section, U.S. EPA - Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Approval by both Agencies is necessary prior to commencement of any activities that are part of the closure plan.

Some facilities may be unable to comply with the financial responsibility requirements for liability coverage under 40 CFR §264.147. If your facility is unable to meet these requirements, or any other applicable requirements of 40 CFR Parts 270 or 264, then we must deny the permit for your facility. In that case, you would probably want to submit a closure plan under 40 CFR Subpart G rather than the completed Part B application.

If your facility never actually treated, stored, or disposed of hazardous waste under RCRA, then it may not be necessary to submit either a Part B application or a closure plan. However, you will have to submit a Part A withdrawal request for review. This request must demonstrate that your facility never actually qualified for interim status because either: 1) the waste was not a hazardous waste as defined in 40 CFR §261; 2) that there has been no treatment, storage, or disposal of the waste since November 19, 1980; or 3) that the hazardous waste management process was exempt from the permitting requirements of RCRA. For example, storage of waste generated on-site in containers or tanks less than 90 days is exempt from the permitting requirements of RCRA in accordance with 40 CFR §262.34. Likewise, treatment in a wastewater tank is exempt under 40 CFR §270.1(c)(2)(u). A withdrawal request must incorporate the signatory requirements contained in 40 CFR §270.11.

The Agency is committed to conducting the RCRA permitting process as efficiently as possible. Consequently, you may want to contact Mr. Daniel Patulski of my staff, at (312) 886-0656, to discuss any questions or concerns you have regarding the preparation of the application. Mr. Patulski will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Should you have any questions about confidentiality of information, please refer to the enclosed rules on confidentiality as set forth in 40 CFR Part 2 and 40 CFR $\S270.12$ of RCRA. If you anticipate asserting a claim of confidentiality, please review the above-referenced enclosure regarding substantiation of confidentiality ($\S2.208$) that sets forth the criteria that must be met for claiming confidentiality.

Please be reminded that submission of the Part B application must be made six months from the receipt date (i.e., date this letter is received). Upon completion of the application, please send two copies to the U.S. EPA and three copies to the OEPA. Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
Post Office Box A-3587
Chicago, Illinois 60690-3587

Send three copies to: Thomas Crepeau

Ohio Environmental Protection Agency

Division of Solid & Hazardous Waste Management

Post Office Box 1049 Columbus, Ohio 43266-1049

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR §270.10. In addition, failure to answer this request may also result in subsequent enforcement action by the U.S. EPA.

Upon receiving the Part B application, the U.S. EPA will coordinate its review with the OEPA and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and OEPA, in lieu of U.S. EPA, will make the final determination on your permit application.

A copy of 40 CFR Part 264 is enclosed to help you in addressing the requirements and standards for the operation of treatment, storage and disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of the July 14, 1986, hazardous waste tank system regulatory amendments is also enclosed. These new rules establish technical standards and operating procedures for the owners and operators of tank systems that use tanks for accumulating, storing or treating hazardous waste. These rules may be applicable to your facility and are, therefore, enclosed for your information.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. This new law amends RCRA and contains many provisions which may affect your facility. Under the corrective action requirements of HSWA, your facility is required to correct all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that the corrective action requirements apply to all solid waste management units, not just the hazardous waste management units subject to the permitting requirements. Enclosed is a document entitled "Certification Regarding Potential Releases from Solid Waste Management Units." It is necessary for you to complete and submit this form with your Part B application to help address corrective action requirements. If you previously completed and submitted this form, and if the information is accurate and up-to-date, you may simply include a copy of your previous submittal in your Part B application.

This Agency looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely,

Wm. E. Muno
William E. Muno

Acting Associate Division Director

Office of RCRA

Enclosures: 40 CFR Part 270 (applicable parts)

Part B Completeness Checklist 40 CFR Part 2 (applicable parts) 40 CFR Part 264 (applicable parts)

Certification Regarding Potential Releases

from Solid Waste Management Units

cc: Paul Flanigan, OEPA

District Office Manager, OEPA

Ed Lim, OEPA

MOLDED FIBER GLASS COMPANY

ASHTABULA, OHIO 44004 PHONE: (216) 997-5851

049 375 215

February 18, 1986

RCRA Activities Region V P.O. Box A3587 Attention: ATKJG Chicago, IL 60690

Gentlemen:

This is in reply to your letter of January 30, 1986 regarding hazardous waste permit application. The Molded Fiber Glass Company does not store any hazardous waste for longer than 90 days. We do store our hazardous waste in drums on a concrete pad with curbing, and to this date, have had no spills.

We do not reclaim any of our wastes here at Molded Fiber Glass Company. If I am misunderstanding your letter, please feel free to call me at (216) 997-5851, Ext. 231, to discuss.

Sincerely,

MOLDED FIBER GLASS COMPANY

amend a. Narducci

Lawrence A. Narducci Purchasing Manager

LAN/gb

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W. FACILITY AShtabul		complete and correct, you need items I, III, V, and VI (excel- must be completed regardless) items if no label has been prov	ot <i>VI-B which</i> Complete all							
VI. LOCATION AShtabul		the instructions for detailed tions and for the legal author which this data is collected.								
II. POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine	whether you need to submit any permit application	n forms to the EPA. If you answer '	'yes" to any							
questions, you must submit this form and the suppleme if the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the	ntal form listed in the perenthesis following the que " to each question, you need not submit any of the	estion. Mark "X" in the box in the t se forms. You may answer "no" if y	hird column your activity							
SPECIFIC QUESTIONS	MARK X' YES NO FORM SPECIFIC (PUESTIONS YE	MARK X'							
A. Is this facility a publicly owned treatment work which results in a discharge to waters of the U.S. (FORM 2A)	include a concentrated aquatic animal productic	(either existing or proposed) animal feeding operation or on facility which results in a U.S.? (FORM 2R)	X							
C. Is this a facility which currently results in discharge to waters of the U.S. other than those described in A or B above? (FORM 2C)	D. Is this a proposed facility	/ fother than those described will result in a discharge to	20 25 X 20 27							
E. Does or will this facility treat, store, or dispose o hazardous wastes? (FORM 3)	municipal effluent below taining, within one que	at at this facility industrial or the lowermost stratum con- arter mile of the well bore,	X							
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surfact in connection with conventional oil or natural gas pro	H. Do you or will you injec	t at this facility fluids for spe- lining of sulfur by the Frasch	32 33							
duction, Inject fluids used for enhanced recovery o oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	process, solution mining tion of fossil fuel, or red (FORM 4)	of minerals, in situ combus- covery of geothermal energy?								
Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 ton structions.	NOT one of the 28 ind instructions and which w	ed stationary source which is ustrial categories listed in the will potentially emit 250 tons	X							
per year or any air polititant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) III. NAME OF FACILITY		or be located in an attainment								
S SKIP MOI ded Fil Ber CI	ASS COMPANY	11.11.11.11.11.11.11.11.11.11.11.11.11.								
A. NAME & TITLE (last,	first, & title)	. PHONE (area code & no.)								
2 JACK SANFORD SAFE V. FACILITY MAILING ADDRESS	TY DIRECTOR 21	6 997 5851								
A. STREET ON P.O.	BOX									
13 77	C.STATE D. ZIP COI									
4/ShTADU/A -Oh/O	0h 4400									
A STREET, ROUTE NO. OR OTHER	SPECIFIC IDENTIFIER									
B. COUNTY NAME	45	309/2								
FSATA BULA CCITY OR TOWN	D.STATE E. ZIPCO	F. COUNTY CODE								
6 A 3 h TABULA	0h 4400	(if known)								
EPA Form 3510-1 (6-80)	SEP 23 1980"		ON REVERSE							

CONTINUED FROM THE FRONT				
VII. SIC CODES (4-digit, in order of priority)				
A. FIRST			B. SECOND	The last of the la
7 (specify)	7 1	8079 (specify)	Asticis	
C. THIRD	13)1	6 - 19	D. FOURTH	
7 3 1 8 9 (specify)	7)	(specify)		
VIII. OPERATOR INFORMATION				- 41
8 KeN: 51PPOLA	A, NAME	PResiden		Is the name listed in Item VIII-A also the owner? VES VES NO
C. STATUS OF OPERATOR (Enter the approximately properties) F = FEDERAL	leral or state) P (specify Collis		D. PHONE (are	a code & no.) 9 5851 22 - 26
4401 BENEFIT AVE	P.O. BOX	1 1 1 1		
F. CITY OR TOWN BISATABULA 15 16		G.STATE H. ZIP CODE 0 4 4004 10 41 42 47 - 51	IX. INDIAN LAND Is the facility located of YES 52	n Indian-lands? NO
X. EXISTING ENVIRONMENTAL PERMITS				
A. NPDES (Discharges to Surface Water) C T	D. PSD (Air Emissions from 9 P 15 16 17 18	Proposed Sources)		
B. UIC (Underground Injection of Fluids)	E. OTHER (spe	cify)		
9 U	9	- spec	rify)	
C. RCRA (Hazardous Wastes)	E. OTHER (spe			
9 R OH DO 4 9 3 7 5 2-1 5 XI. MAP	9 15 16 17 18	- 30 (spec	ify)	
Attach to this application a topographic map the outline of the facility, the location of ea treatment, storage, or disposal facilities, and water bodies in the map area. See instructions	h of its existing and propo each well where it injects f for precise requirements.	sed intake and discharge	structures, each of its	hazardous waste
Molded Fiber G	lass company, is a	reinforced fiberg	glass production	of parts
for homes, far	n machinery, auto i	ndustries, and ma	rine use, mixin	g of
fiberglass and	resin and cure tim	e in a press mach	ine to produce	parts:
The service of the property of				
	gan			
VIII OF DELENOATION / TO THE PARTY OF THE PA				
I certify under penalty of law that I have penaltachments and that, based on my inquiry application, I believe that the information is false information, including the possibility of	of those persons immedia true, accurate and complet fine and imprisonment.	tely responsible for obtain	ining the information are significant penalti	contained in the es for submitting
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATIVE		C. DA	TE SIGNED
Ken Sippola President &	General Mgr. Ce	wett W Sy	PROL	8/5/80
COMMENTS FOR OFFICIAL USE ONLY				
C	111111111			
EPA Form 3510-1 (6-80) REVERSE			55	

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G

	(continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS.	T	METRIC TONS	

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form,

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line,
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste,

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

ы				EP/		D POTIMETER SAISHISE		C. UNIT											D. PROCESSES
LINE		NA	ST	CO	IO	B. ESTIMATED ANNUAL QUANTITY OF WASTE	S	unte ode,	ter		1. PROCESS CODES (enter)				ss code ter)	S		2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
X-	1	K	0	5	4	900		P		T	0	3	D	8	0			9	902 1 5 2
Х-	2	D	0	0	2	400		P		T	0	3	D	8	0			1 1	one this
Χ-	3	D	0	0	1	100		P		T	0	3	D	8	0			1 1	
X-		D	0	0	2														included with above



Continued from page 2.

NOTE: Photocopy this page before completing it, J have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

The same of the sa	EP/	4 1.1	0.1	NUN	BER (enter from page 1) 9 3 7 5 2 1 5 7 1			W		FC	STATE OF THE PARTY	CIAL USE	Porm Approved OMB No. 158-580004 ONLY 15/A C 2 D U P 15/ 14/ 15/ 23 - 26
	1-11	SC!	-	1	ON OF HAZARDOUS WAST								D. PROCESSES
LINE NO.	H	AZ AS	AF	NO ode)	STEURAL OF THE SHORE STATE	00	UNIT MEA SURE enter eode)	HE P		1. PROCE		ES	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	23 F		0	1	43,000		э _б Р	27 -	29	27 - 29	27 - 2	9 27 - 29	Methylene Chloride
2	F	0	0	3	19,200		P						Acetone
3	F	0	0	5	4,800		P			3 103 - 1			Methyl Ethyl Ketone
4									1	-			
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EPA F	or	m 3	510			-	-		V 70				CONTINUE ON REVERSE

EPA Form 3510-3 (6-80)

A. NAME (print or type)

including the possibility of fine and imprisonment.

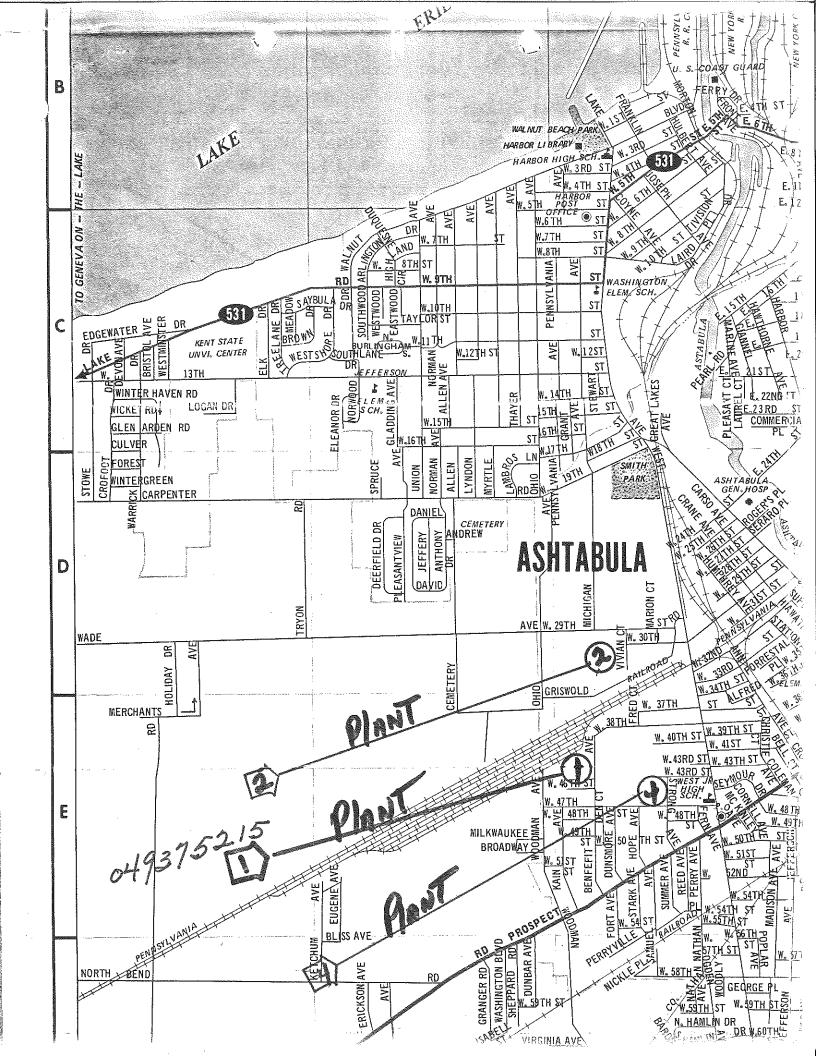
Ken Sippola

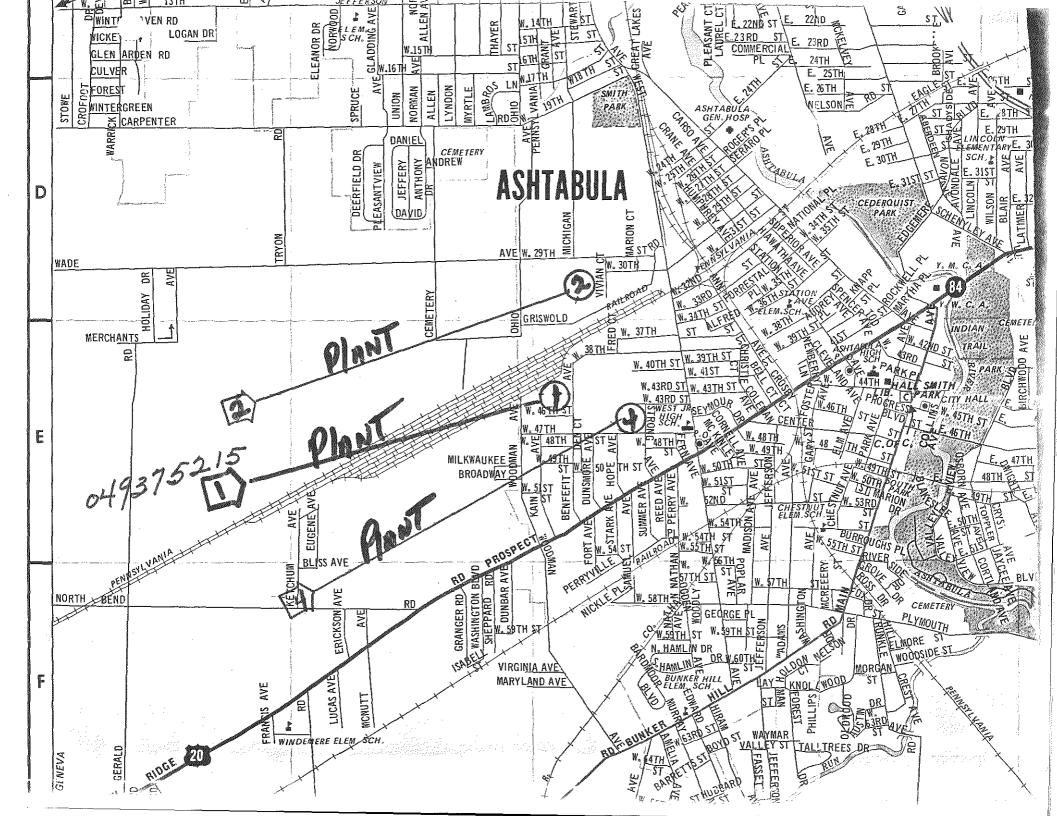
mum m

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information,

9/19/80

CONTINUE ON PAGE 5





OHDO 49 375215



RCRA Activities

P. O. Box A3587

Attn: 5HW-TUB

Chicago, 111 60690

Attention: Financial requirements

Doy C. Gillespie treasurer

molded fiber glass companies

corporate offices: 1315 west 47th street p.o. box 675 - ashtabula, ohio 44004 phone 216/997-5851

October 12, 1982

OCT 1 4 1982

WASTE MANAGEMENT BRANCH EPA. REGION V

Molded Fiber Glass Company Re:

OHDO 49375215

Gentlemen:

Per your request to Mr. Jack Sanford via a certified letter from Mr. William Miner, I'm enclosing the following:

- As proof of financial assurance I offer a copy of our consolidated financial statement;
- As proof of liability coverage I offer a Certificate of Insurance from Liberty Mutual Insurance Company.

Please contact me if further information is required.

Very truly yours,

Doy C. Gillespie

DCG/mm

Enclosures

DIVISIONS: molded fiber glass company • MFG union city operations • molded fiber glass tray company •

MFG water treatment products company

AFFILIATES: morrison molded fiber glass company

MOLDED FIBER GLASS COMPANIES CONSOLIDATED BALANCE SHEET AUGUST 28, 1982

(Unaudited)

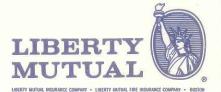
Assets	<u>Total</u>
Current Assets:	+ ****
Cash	\$ 166,600
Receivables:	1 -1 - 1
Trade	4,245,400
Notes	42,800
Inventories:	,
Raw Materials	1,962,200
Work-in-Process	734,500
Finished Products - Resale	535,800
Finished Products - Rental	726,800
LIFO Reserve	(1,688,000)
Customer Dies in Process	(3,600)
Prepaid Insurance & Deposits	84,900
Other Prepaid Expenses	86,900
Investments:	•
Securities at Cost - Note A	1,189,800
Total Current Assets	8,084,100
Property, Plant, Equip. Etc.	
Cost	22,924,400
Accumulated Depreciation	11,105,000
noodild valous Doprootation	
Net Property, Plant, Equip. Etc.	11,819,400
Other Assets:	
Long-Term Portion - Notes Receivable	74,300
Cash Value Life Insurance	313,000
Other	500
v ••	
Total Other Assets	387,800
· · · · · · · · · · · · · · · · · · ·	
TOTAL ASSETS	\$20,291,300
e or in the many thanks to or	11

Note A - Market Value of Securities at August 28, 1982 were \$5,212,603

MOLDED FIBER GLASS COMPANIES CONSOLIDATED BALANCE SHEET AUGUST 28, 1982

(Unaudited)

Liabilities & Net Worth	Total
Current Liabilities: Notes Payable: Working Capital Accounts Payable: Trade	\$ 2,093,000
Accrued Liabilities: Income Tax Payable Other	205,100 1,965,400
Total Current Liabilities	4,263,500
Long-Term Debt: Banks Other	7,523,700 272,700
Total Long-Term Debt	7,796,400
Deferred Income, Expenses & FIT	817,100
Stockholders' Equity: Class A & B Stock Retained Earnings Net Income - Current Year	1,468,000 5,593,000 353,300
Total Stockholders' Equity	7,414,300
TOTAL LIABILITIES & STOCKHOLDERS' EQUITY	\$20,291,300



This is to Certify that

Molded Fiber Glass Companies 1315 West 47th Street Ashtabula, OH 44004

Name and address of Insured.

is, at the date of this certificate, insured by the Company under the policy(ies) listed below. The insurance afforded by the listed policy(ies) is subject to all their terms, exclusions and conditions and is not altered by any requirement, term or condition of any contract or other document with respect to which this certificate may be issued.

TYPE OF POLICY		YPE OF POLICY EXPIRATION DATE		LIMITS OF LIABILITY					
	WORKERS'			COVERAGE AFFORDED UNDER W.C. LAW OF FOLLOWING STATES LIMIT OF LIABILITY-COV B (Indicate Limit for each state)					
				MARITIME COVERAGE-FOLLOWING STATES LIMIT OF LIABILITY MARITIME COVERAGE					
	E COMPREHENSIVE			BODILY INJURY PROPERTY DAMAGE					
	COMPREHENSIVE FORM SCHEDULE FORM			\$ 1,000,000 EACH OCCURRENCE \$ 500,000 OCCURRENCE					
LIABILITY	PRODUCTS COM- PLETED OPERATIONS	9/1/83	LG1-181-014191-172	\$ 1,000,000 AGGREGATE \$ 500,000 AGGREGATE					
LIAB	INDEPENDENT CON- TRACTORS/CONTRAC- TORS PROTECTIVE			COMBINED SINGLE LIMIT BODILY INJURY AND PROPERTY DAMAGE					
	X CONTRACTUAL LIABILITY	18		\$ EACH OCCURRENCE \$ AGGREGATE					
AUTO	OWNED NON-OWNED		77.7	\$ EACH PERSON EACH ACCIDENT OR OCCURRENCE \$ EACH ACCIDENT OR OCCURRENCE					
EA	HIRED			\$ EACH ACCIDENT-SINGLE LIMIT-B.I. AND P.D. COMBINED					
OTHER				×					
LOCA	TION(S) OF OPERATIONS &	JOB # (If Applicab	le)	DESCRIPTION OF OPERATIONS:					

NOTICE OF CANCELLATION: (NOT APPLICABLE UNLESS A NUMBER OF DAYS IS ENTERED BELOW). BEFORE THE STATED EXPIRATION DATE THE COMPANY WILL NOT CANCEL OR REDUCE THE INSURANCE AFFORDED UNDER THE ABOVE POLICIES 60 DAYS NOTICE OF SUCH CANCELLATION OR REDUCTION HAS BEEN UNTIL AT LEAST_ MAILED TO:

United States Environmental Protection

Agency

RCRA Activities

Attn: Financial Requirements

P.O. Box A3587 Chicago, IL 60690

10/7/82 DATE ISSUED

Erie, PA

This certificate is executed by LIBERTY MUTUAL INSURANCE COMPANY as respects such insurance as is afforded by That Company, it is executed by LIBERTY MUTUAL FIRE INSURANCE COMPANY as respects such insurance as is afforded by That Company. BS 234 R10

D. Corrective Action January 8, 1998

Patricia Brown-Derocher Regional Manager TechLaw Inc. 10 South Wacker Drive Suite 2100 Chicago, Illinois 60606

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052

Dear Ms. Brown-Derocher:

I have reviewed the Preliminary Assessment/Visual Site Inspection (PA/VSI) and NCAPS Scoring Report for Molded Fiber Glass U.S. EPA ID No. OHD 049 375 215 enclosed with your letters of December 31, 1997 and January 14, 1998 respectively. The PA/VSI Report and NCAPS Scoring Report that were enclosed constitute an acceptable the final deliverable for this facility.

Please provide Molded Fiber Glass and the Ohio EPA with a copy of this finding for their records.

Please contact me at (312) 886-0977 if you have any questions.

Sincerely,

Gerald W. Phillips

Corrective Action Process Manager

Waste, Pesticides and Toxics Division

cc:

F. Norling, U. S. EPA

R. Young, TechLaw





TECH LAW INC.

PHONE: (312) 578-8900 FAX: (312) 578-8904

RZ2.R05052.01.ID.057

December 31, 1997

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Reference:

EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Environmental Priorities Initiative (EPI) Assessments; Molded Fiber Glass Company, Ashtabula, Ohio, EPA I.D. No. OHD049375215; PA/VSI Report; Task 04

Deliverable

Dear Mr. Phillips:

Please find enclosed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report for the referenced facility.

Should you have any questions or require additional information, please feel free to contact me at 312-345-8963 or Mr. Rob Young at (312) 345-8966.

Sincerely,

Patricia Brown-Derocher

Regional Manager

Enclosure

cc:

F. Norling, EPA Region 5, w/o attachment

W. Jordan/Central Files

R. Young

Chicago Central Files

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT FOR MOLDED FIBER GLASS COMPANY 4401 BENEFIT AVENUE ASHTABULA, OHIO EPA I.D. NO. OHD049375215

Submitted to:

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Submitted by:

TechLaw, Inc. 10 South Wacker, Suite 2100 Chicago, Illinois 60606

EPA Work Assignment No. Contract No. TechLaw WAM Telephone No. EPA WAM Telephone No. R05052 68-W4-0006 Mr. Rob Young 312/345-8966 Mr. Gerald Phillips 312/886-0977

December 31, 1997

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT FOR MOLDED FIBER GLASS COMPANY ASHTABULA, OHIO EPA I.D. NO. OHD049375215

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III.	SOLID WASTE MANAGEMENT UNITS III-1
IV.	AREAS OF CONCERN IV-1
V.	CONCLUSIONS V-1
VI.	REFERENCES
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	and Areas of Concern (100s)
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Appendix B	Visual Site Inspection Field Notebooks
Appendix C	Facility Layout and SWMU/AOC Locations

I. <u>EXECUTIVE SUMMARY</u>

The first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) is the RCRA Facility Assessment. The purpose of the RFA is to identify environmental releases or potential releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that may require corrective action by the facility owner. A Preliminary Assessment/Visual Site Inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Molded Fiber Glass Company (MFG) facility.

A Preliminary Assessment (PA) of the available U.S. Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) file materials was conducted by TechLaw's subcontractor Metcalf & Eddy, Inc. (M&E) to gain familiarity with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes, and waste management practices at the MFG facility.

A Visual Site Inspection (VSI) was conducted on September 10, 1997, by M&E to identify and characterize the SWMUs and AOCs. Additional file material was provided to M&E during the VSI by Ms. Christine Gammon, MFG Environmental Engineer. Photographs were taken during the VSI and are documented in Appendix A of this report. The VSI field notes are included in Appendix B and a site map showing SWMU and AOC locations is presented in Appendix C.

A total of four SWMUs and one AOC were identified and are described in Sections III and IV of this report. M&E characterized three of the SWMUs as having a low potential for release and the Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas (SWMU 2) as having a high potential for release. The higher potential for release from SWMU 2 is due to insufficient information regarding hazardous waste storage for approximately 40 years between 1948 and 1987.

The Former Styrene UST (AOC A) is also characterized as having a high potential for release. Confirmation soil samples taken during removal of the Former Styrene UST detected styrene at concentrations of 0.011 mg/kg and 0.016 mg/kg. A closure report was prepared for the Former Styrene UST (AOC A) and submitted in accordance with 40 CFR Part 280 and the State of Ohio Bureau of Underground Storage Tank Regulations (BUSTR).

II. SITE DESCRIPTION

The MFG facility is located at 4401 Benefit Avenue in Ashtabula, Ohio. The site is located in a mixed-use industrial and commercial/residential area bordered by railroad tracks to the west and southwest, Ashland Chemical to the south, Benefit Avenue to the east, and industry to the north. The areas immediately east and south of the site are a mixture of residential and commercial use.

The facility consists of a 160,000 square foot building with five acres of land. Approximately one-half of the building is used for the storage of raw materials, tools, and finished product. The other half of the facility consists of manufacturing lines. The plant operates 24 hours per day, six to seven days per week. A fence surrounds the facility, however there is no front-gate security at the plant.

The plant was constructed in 1946 as a pulp-reinforced plastic manufacturer. MFG purchased the facility in 1948 and began manufacturing fiber glass-reinforced plastics. MFG produces a wide variety of molded fiber glass products from resin impregnated cloth using sheet molding compounding, manual coating of fiber glass, and pressure molding.

The sheet molding process is the process of spraying fiber glass onto molds to produce the foundation of the fiber glass product. These fiber glass foundations are then manually coated with resins. The resins are batch mixed and taken to the molding lines in 55-gallon drums or barrels. The resins are manually applied to the forms by pouring them from pitchers. The coated form is then pressure molded in a press with heat to make the final product.

Hazardous waste streams are generated when unused resins are removed from the barrels and pitchers. Waste solvents are generated when solvents are used to clean the molds, machines, barrels, and pitchers. Hazardous waste streams include chlorinated solvents (F002/F005), methyl ethyl ketone (F005), parts washer solvents (D001), unused resin (D001), acetone (F003), and a solids/solvents mixture (F005). Approximately four, 55-gallon drums of hazardous waste are shipped off-site every two weeks.

Environmental Setting

The topography of the MFG site is relatively flat and covered primarily with glaciated soil. The bedrock geology of the area is composed of Devonian Ohio Shale. Soil deposits are a result of multiple periods of glaciation, the most recent period being the Wisconsin Age. The Conneaut-Elnora surface soil types at the site range from highly organic to sandy and acidic in composition. Although there are no groundwater wells located at the facility, groundwater was encountered during the removal of the Former Styrene UST (AOC A) at four feet below ground surface.

The nearest surface water is the Ashtabula River which is approximately one and one-quarter miles to the east of MFG facility. However, the facility is located outside the 100 year flood plain of the Ashtabula River.

The facility does not discharge process wastewater and does not maintain any permitted outfalls. Stormwater from the site is collected in municipal storm sewers operated by the City of Ashtabula and is likely discharged to the Ashtabula River which is primarily used for recreation and industrial uses. Drinking water in the vicinity of the facility is taken from Lake Erie located approximately two miles north of the facility.

Regulatory History

On September 9, 1985, the MFG facility was the subject of an Environmental Assessment by the Ohio Environmental Protection Agency (OEPA). Based on this assessment, it was recommended by OEPA that the MFG facility be given a low priority for state CERCLA investigations since there was no evidence of unregulated activities at the site.

On June 20, 1996 OEPA performed a Compliance Evaluation Inspection (CEI) of the MFG facility. It was determined from this inspection that MFG had violated several state hazardous waste regulations, including storage of open drums of hazardous wastes in the barrel room and improper labeling and storage times for hazardous wastes.

In the late 1980's, the facility was operating with MFG Plant Two, also located in Ashtabula, under the current USEPA identification number. MFG Plant Two now operates under a separate USEPA identification number (OHD153745138). In July of 1996, the MFG facility switched from Small Quantity Generator (SQG) status to Large Quantity Generator (LQG) status.

The facility does not discharge process wastewater, therefore, the facility does not have an NPDES permit. Stormwater from the facility is discharged to the municipal sewer system of Ashtabula.

The facility operates under Air Permit Facility Number 0204010173. No air permit violations were noted in the available files.

Release History

There have been no releases identified for any of the SWMUs at the MFG facility.

Evidence of a release has occurred at the Former Styrene UST (AOC A). Confirmation soil samples taken during the removal of the Former Styrene UST detected styrene at

concentrations of 0.011 mg/kg and 0.016 mg/kg, although the depth of these samples was not clear from the closure report. The Former Styrene UST was excavated to a depth of eight feet below ground surface, and there is a high probability that styrene was released to groundwater, which was encountered at four feet below ground surface during excavation.

A closure report was prepared for the Former Styrene UST (AOC A) and submitted in accordance with 40 CFR Part 280 and the State of Ohio Bureau of Underground Storage Tank Regulations (BUSTR). According to MFG, BUSTR required no further action for the Former Styrene UST (AOC A).

III. SOLID WASTE MANAGEMENT UNITS

This section presents descriptions of the SWMUs identified during the PA/VSI for the MFG facility. Photograph numbers correspond to those presented in the Visual Site Inspection Photograph Log in Appendix A.

Table 1. Solid Waste Management Units and Areas of Concern

SWMU/AOC	<u>Description</u>	Release Potential
1 .	Current Hazardous Waste Storage Area	Low
2	Former Hazardous Waste Storage Area/ Current Satellite Accumulation Areas	High
3	Temporary Hazardous Waste Storage Area	Low
4	Parts Washer	Low
A	Former Styrene UST	High

SWMU 1 - Current Hazardous Waste Storage Area

Photograph No(s): 1

Period of Operation: 1994 to Present

Location: This unit is located inside the facility building near the receiving/loading dock.

Physical Description: This unit consists of a six foot by eight foot containment storage pad, which is used to store hazardous wastes prior to shipment for off-site disposal. Currently, approximately four, 55-gallon drums of hazardous waste are shipped off-site every two weeks.

Wastes Managed: This unit manages chlorinated solvents (F002/F005), methyl ethyl ketone (F005), parts washer solvents (D001), unused resin (D001), acetone (F003), and a solids/solvents mixture (F005).

History of Releases: No history of releases or evidences of releases were identified through the review and inspection process of the PA/VSI.

Potential for Past/Present Release: High ()
Moderate ()
Low (X)

Conclusions: No further action is recommended for this SWMU since this unit has no history of releases, showed no evidence of releases, and is constructed with secondary containment.

<u>SWMU 2 - Former Hazardous Waste Storage Area/</u> <u>Current Satellite Accumulation Areas</u>

Photograph No(s): 2, 3, 4, 5

Period of Operation: 1948 to Present

Location: This unit is located in the barrel room in the center of the building near the east end of the manufacturing area.

Physical Description: During the VSI, facility personnel indicated that they did not know exactly where hazardous waste was stored on the property between 1948 and 1987, when the Former Hazardous Waste Storage Area (SWMU 3) began operations. While SWMU 2 is currently being used as satellite accumulation areas, it is possible that this area was used as the primary storage area for hazardous waste for approximately 40 years between 1948 and 1987. Using current generation estimates of four, 55-gallon drums of hazardous waste every two weeks, it is possible that this area once stored a significant number of drums for a significant period of time in the past.

Currently, the area consists of a concrete floor process and storage area which is used as a Hazardous Waste Satellite Storage Area for four, 55-gallon drums: one drum in the Bench Barrel Satellite; Drippings Satellite; and two drums in the Spent Solvent Satellite. The Bench Barrel Satellite is used to collect unused resin ignitables from the bench barrels located on the press lines. At the time of the VSI, a single drum was being stored with no secondary containment. The Drippings Satellite is used to collect unused resin ignitable drippings from pitchers used in applying the resin mix to molds in the press lines. During the VSI, the single drum was located in a drip pan on a wooden pallet. The Spent Solvent Satellite consists of two, 55-gallon drums that formerly stored waste methylene chloride used as a solvent/cleaner generated from the cleaning of presses and forms. Application rags containing solvents are currently laundered by an off-site service. Since April 1997, methylene chloride has been replace with Chemical Solvent SP182. At the time of the VSI, the two drums in the Spent Solvent Satellite were stored on a secondary containment platform.

Wastes Managed: This unit currently manages waste styrene (D001), waste methylene chloride (F002), waste spent solvent mixtures (D001, D018, F003). It is possible that this area managed these same wastes in the past when this area served as a storage area for hazardous waste.

<u>SWMU 2 - Former Hazardous Waste Storage Area/</u> <u>Current Satellite Accumulation Areas</u> (Continued)

History of Releases: Although no documented releases were identified in OEPA file materials, there is a high degree of uncertainty regarding storage practices of hazardous waste for nearly 40 years between 1948 and 1987. There is a high probability that releases occurred during this period, given the lack of information regarding the historical operation of this unit and the high volumes of hazardous waste which could have been stored in this area.

Potential for Past/present Release: High		X)
Moderate	()
Low	()

Conclusions: Further investigation should be undertaken to determine probable areas where hazardous wastes were stored between 1948 and 1987. Sampling is recommended for this unit to confirm the presence of absence of hazardous constituents in soil and groundwater beneath this unit. Any further action regarding this unit should be coordinated with OEPA personnel.

SWMU 3 - Temporary Hazardous Waste Storage Area

Photograph No(s): No Photograph Available

Period of Operation: 1987 to 1989

Location: This unit was located where the western portion of the main facility building is currently located.

Physical Description: This unit, which was removed from the facility in 1994, consisted of a diked building that was used to store hazardous wastes for less than 90 days prior to transport off-site. The building dimensions were not specified in the files however, the files indicate that the building was constructed to provide containment for spills.

There was no indication that MFG violated the 90 day storage permit for the Temporary Hazardous Waste Storage Area.

Wastes Managed: This unit primarily managed spent solvents.

History of Releases: No releases were identified in OEPA file materials or during the VSI.

Potential for Past/Present Release: High ()
Moderate ()
Low (X)

Conclusions: No further action is recommended for this SWMU since no history of releases or evidence of releases were identified during the PA/VSI.

SWMU 4 - Parts Washer

Photograph No(s): 6

Period of Operation: Late 1980s to Present

Location: This unit is located in the hydraulic room in the center of the plant.

Physical Description: This unit consists of a dip-bath, solvent-based parts washer where organic material is removed from machinery parts. The unit manages less than 55-gallons of solvent at any one time.

Wastes Managed: This unit manages spent solvents reported as D001, D006, D008, D018, D035, D039 and D040.

History of Releases: No history of releases or evidence of releases were identified through the review and inspection process of the PA/VSI.

Potential for Past/Present Release: High ()
Moderate ()
Low (X)

Conclusions: No further action is recommended for this SWMU since no history of releases or evidence of releases were identified during the PA/VSI.

IV. AREAS OF CONCERN

This section presents a description of the Area of Concern (AOC) identified during the PA/VSI of the MFG facility.

AOC A - Former Styrene UST

Photograph No(s): No Photograph Available

Description: This unit consists of a former 3,000 gallon, steel UST which was used to store styrene product. The UST was single-walled, anodized, and contained an epoxy-coated interior.

The UST was removed on November 18, 1991. A concrete vault was placed on top of the tank where a man way, supply line, feed line, and vent line were positioned.

Styrene was detected at 0.011 mg/kg and 0.016 mg/kg in confirmation soil samples taken at the base of the UST excavation during closure.

A closure report was prepared for the Former Styrene UST and submitted in accordance with 40 CFR Part 280 and the State of Ohio Bureau of Underground Storage Tank Regulations (BUSTR). According to MFG, BUSTR required no further action for the Former Styrene UST.

Conclusions: Although the Former Styrene UST has been closed through the State of Ohio BUSTR, this AOC is characterized with a high release potential based on styrene detections in soil surrounding the UST. It is recommended that sampling be undertaken to determine the nature and extent of styrene contaminated soils at this AOC. Further action should be coordinated with the State of Ohio BUSTR.

V. <u>CONCLUSIONS</u>

Further action is recommended for the Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas (SWMU 2) and the Former Styrene UST (AOC A).

Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas (SWMU 2) Further investigation should be undertaken to determine where hazardous wastes were stored between 1948 and 1987. Although no documented releases were identified in OEPA file materials, there is a high degree of uncertainty regarding storage practices and the operation of this unit for nearly 40 years between 1948 and 1987. There is a high probability that releases occurred during this period, given the lack of information regarding the historical operation of this unit and the high volumes of hazardous waste which could have been stored in this area. Sampling is recommended for this unit to confirm the presence or absence of hazardous constituents in soil and groundwater beneath this unit. Any further action regarding this unit should be coordinated with OEPA personnel.

Former Styrene UST (AOC A)

A closure report was prepared for the Former Styrene UST (AOC A) and submitted in accordance with 40 CFR Part 280 and the State of Ohio Bureau of Underground Storage Tank Regulations (BUSTR). According to MFG, BUSTR required no further action for the Former Styrene UST (AOC A).

Although the Former Styrene UST (AOC A) has been closed through the State of Ohio BUSTR, this AOC is characterized with a high release potential based on styrene detections in soil surrounding the UST. It is recommended that sampling be undertaken to determine the nature and extent of styrene contaminated soils at this AOC. Further action should be coordinated with the State of Ohio BUSTR.

VI. REFERENCES

- 1. VSI Logbook, R. Budzilek and J. Krebs, Metcalf & Eddy, Inc., September 10, 1997.
- 2. 1995 Fee Emission Report, Molded Fiber Glass Company, dated May 1, 1996.
- 3. Underground Styrene Storage Tank Closure and Assessment Report for Molded Fiber Glass Plant #1 and Plant #2, prepared by Ecology Technologies, Inc., dated November 25, 1991.
- 4. Preliminary Assessment Report, prepared by Ohio EPA, dated September 9, 1985.
- 5. Hazardous Waste Inspection Report for Molded Fiber Glass Plant #2, prepared by Ohio EPA, dated September 6, 1989.
- 6. 1995 Hazardous Waste Report for Molded Fiber Glass Plant #1, prepared by Molded Fiber Glass, dated February 19, 1996.
- 7. Response Letter from Molded Fiber Glass to Ohio EPA, prepared by Christine Gammon, dated July 18, 1996.
- 8. Response Letter from Molded Fiber Glass to Ohio EPA, prepared by Christine Gammon, dated August 27, 1996.

APPENDIX A
Visual Site Inspection Photograph Log



Photo No.: 1 Date: 9/10/97 Time: Approximately 1000 Direction: North

Description: View of the Current Hazardous Waste Storage Area (SWMU 1).



Photo No.: 2 Date: 9/10/97 Time: 1000 (Approximately)

Direction: North

Description: View of barrel room which housed the Former Hazardous Waste Storage

Area and Current Satellite Accumulation Areas (SWMU 2).



Photo No.: 3 Date: 9/10/97 Time: 1000 (Approximately)
Direction: South

Description: View of the Bench Barrel Satellite Drum as part of the Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas (SWMU 2).



Photo No.: 4 Date: 9/10/97 Time: 1000 (Approximately)
Direction: South

Description: View of the Drippings Satellite Drum as part of the Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas (SWMU 2).



Photo No.: 5 Date: 9/10/97 Time: 1000 (Approximately)

Direction: North

Description:

View of the two (2) Spent Solvent Satellite Drums as part of the Former Hazardous Waste Storage Area/Current Satellite Accumulation Areas

(SWMU 2).

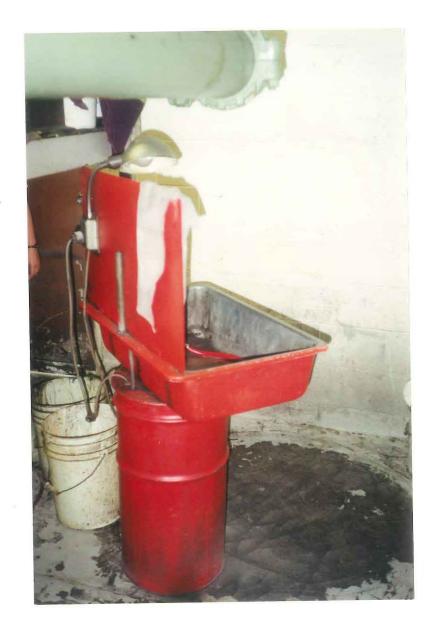


Photo No.: 6 Date: 9/10/97

Description: View of Parts Washer (SWMU 4).

Time: 1000 (Approximately)
Direction: North

APPENDIX B
Visual Site Inspection Field Notebook

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T = R tan I	R = T cot. 1	Chord def. = $\frac{\text{chord}^2}{R}$
$= \frac{\text{Sin. } \frac{1}{2} \text{ D}}{\text{Sin. } \frac{1}{2} \text{ D}}$ Sin. $\frac{1}{2} \text{ D} = \frac{50}{R}$	$R = \frac{50}{\sin AD}$	No. chords = $\frac{1}{D}$
Sin. $\frac{1}{2}D = \frac{R}{50 \tan \frac{3}{2} \ln \frac{1}{4}}$	E = R ex. sec I $E = T (an I$	Tan. def. = } chord def.

The square of any distance, divided by twice the radius, will equal the distance from tangent to curve, very nearly.

To find angle for a given distance and deflection.

Rule 1. Multiply the given distance by .01745 (def. for 1° for 1 ft.) and divide given deflection by the product.

Rule 2. Multiply given deflection by 57.3, and divide the product by the given distance.

To find deflection for a given angle and distance. Multiply the angle by .01745, and the product by the distance.

GENERAL DATA

RIGHT ANGLE TRIANGLES. Square the altitude, divide by twice the base. Add quotient to base for hypotenuse.

Given Base 100, Alt. $10.10^2 \pm 200 = .5$. $100 \pm .5 = 100.5$ hyp.

Given Hyp. 100, Alt. 25.25² ÷ 200 = 3.125: 100 - 3.125 = 96.875 = Base. Error in first example, .002; in last, .045.

To find Tons of Rail in one mile of track: multiply weight per yard by 11, and divide by 7.

Leveling. The correction for curvature and refraction, in feet and decimals of feet is equal to 0.574 d², where d is the distance in miles. The correction for curvature alone is closely, \$d². The combined correction is negative.

PROBABLE Error. If d_1 , d_2 , d_3 , etc. are the discrepancies of various results from the mean, and if Σd^2 the sum of the squares of these differences and n=the number of observations, then the probable error of the mean = $\pm 0.6745 \sqrt{\frac{\Sigma d^3}{n(n-1)}}$

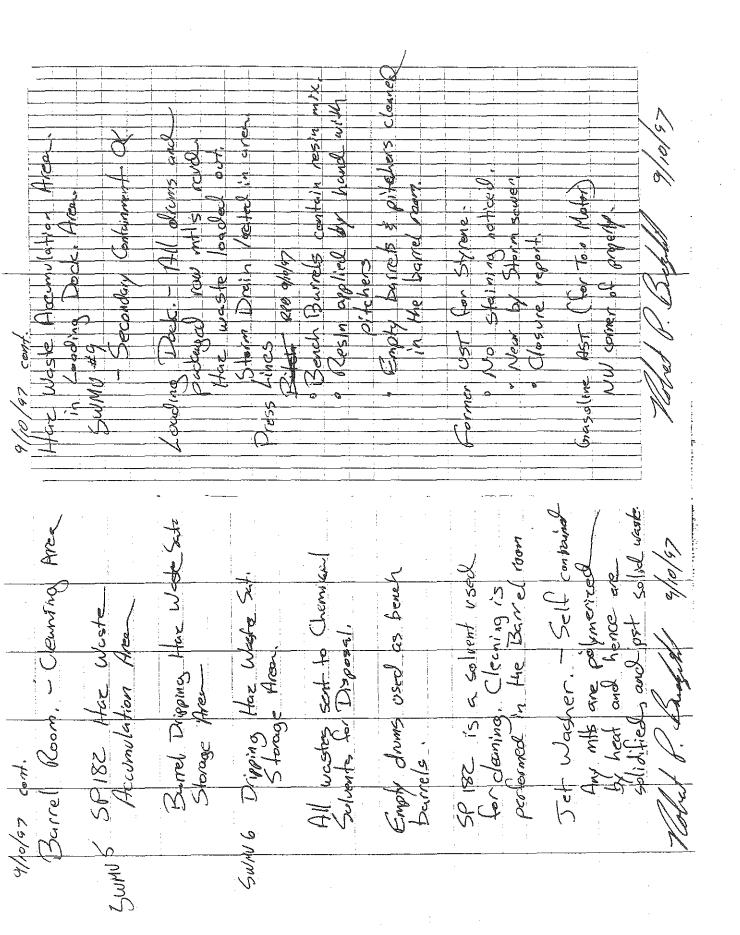
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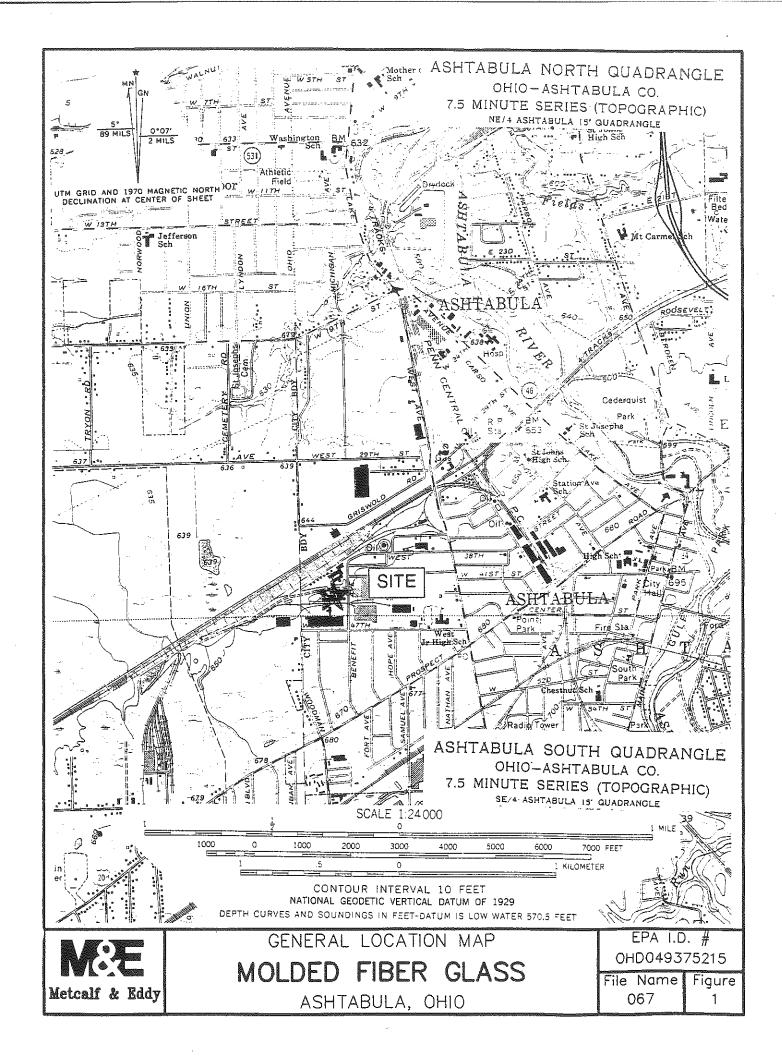
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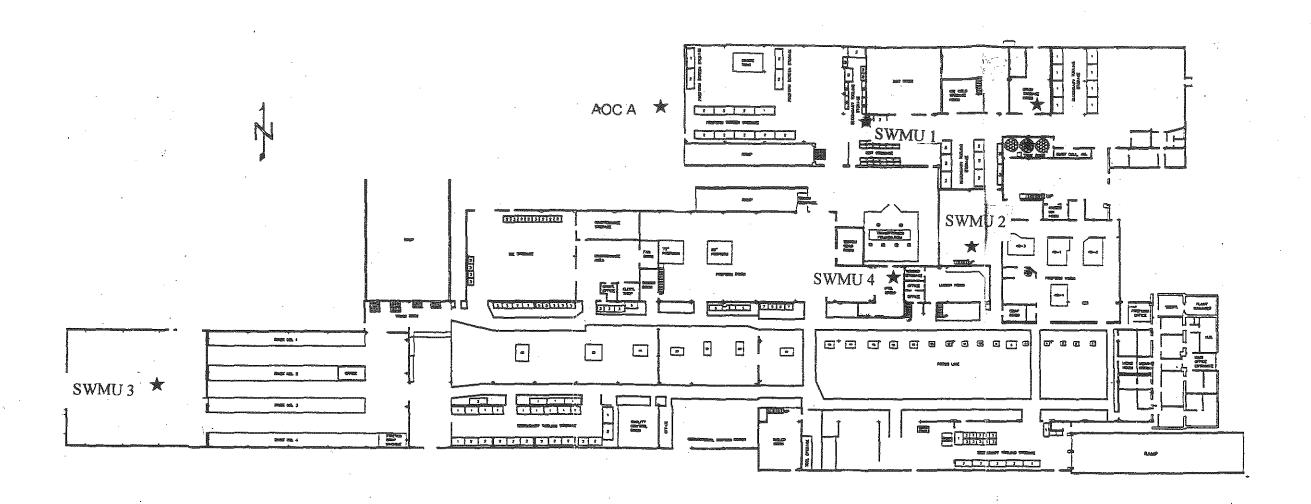
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APPENDIX C
Facility Layout and SWMU and AOC Locations





SWMU\AOC - ★



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